We appreciate the opportunity to comment on the draft of Illinois' 1115 Waiver on behalf of the members of Illinois Adult Day Service Association. Our association is optimistic about the introduction of an 1115 waiver and look forward to participating throughout the process of it's development and implementation. Although adult day service programs are a very small part of the current health care delivery system, adult day centers have the potential to contribute significantly to the success of goals of the 1115 waiver.

There are approximately 100 Adult Day Centers located throughout the state. These centers have diverse sponsorship, size, operational models, as well as, the ethnicity and populations served. Most adult day centers provide services through contracts with IDoA. In addition, many also provide services through contracts with ORS, VA, MCOs and Long Term Care Insurers. Some programs may also serve individuals through other funding programs such as TBI, Mental Health, or Developmental Training. The provision of services through multiple contracts make adult day service providers painfully aware of the issues resulting from services "compartmentalized under nine separate waivers, three departments and numerous divisions within departments". The awareness of the results of "compartmentalization" on service providers, but more importantly the disparity of service options for our clients leads to our support for the waiver application.

Centers that contract with IDoA are certified as "health" models, although centers offer different levels and scopes of health services depending upon their internal mission and

policies. Nursing services can include medication administration and management, colostomy care, tube feeding, wound care, diabetic monitoring and care, continence care and management, disease education, seizure monitoring and care.

- Services offered by Adult Day Centers includes, but not limited to:
 - Therapeutic Activities
 - Nutritious Meals & Snacks
 - Transportation
 - Nursing care
 - o Personal Care
 - Educational and support activities for family care givers
 - Outings for community integration

Additionally, many centers have arrangements to provide medical services (billed separately) such as podiatry, psychiatry, dental care, behavioral specialists and physical/occupational/speech therapy. Provision of these services within the adult day center is not only reduces the stressors on the populations served, but the family care givers too.

Adult day service clearly has the potential to make significant contributions to the process of establishing integrated health delivery systems connecting primary care and community based LTSS. However, there needs to recognition of adequate funding to support the diversity of care provided in an adult day center and the potential need for federal funds to be directed enabling adult day centers to be fully participating members of the enhanced LTSS. For example, certification and fee schedules for more intensive services that could assist in decreasing hospitalizations and providing services at the centers that would typically require a skilled home health visit.

We look forward to working with the state and other service providers to improve the quality and coordination of care for all our clients. Please feel free to contact us with any questions.

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